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Attorneys for Plaintiffs

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

J.R.G., et al.,

Plaintiffs,

v.

UNITED STATES OF AMERICA,
Defendant.

CASE NO. 4:22-cv-05183-KAW

**STIPULATION FOR CONTINUANCE
OF CASE MANAGEMENT
CONFERENCE AND ORDER**

Plaintiffs J.R.G. and M.A.R. and Defendant United States of America (collectively, the “Parties”), by and through their respective counsel, hereby stipulate and agree, pursuant to Civil Local Rule 7-12 and subject to the Court’s approval, as follows:

WHEREAS, November 9, 2023, the Court granted the Parties’ stipulation for a continuance of the scheduled Case Management Conference, resetting it for February 27, 2024, at 1:30pm, Dkt. 59;

STIPULATION FOR CONTINUANCE OF CMC AND ORDER
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WHEREAS, since the May 17, 2023 Case Management Conference, the Parties have produced hundreds of thousands of pages of discovery as contemplated by their agreed-upon 90-Day Disclosure period (*see* Dkt. 48), and the Parties are currently reviewing those productions;

WHEREAS, while the first sets of discovery were recently propounded in this matter, the Parties agreed to toll any responses as they engage in efforts to resolve this matter without judicial intervention;

WHEREAS, the Parties have no other substantive updates or issues requiring the Court's attention at this time;

WHEREAS, the Parties have met and conferred and are engaged in settlement discussions that could potentially lead to the resolution of Plaintiffs' claims;

NOW THEREFORE, respectfully suggest that the February 27, 2024 Case Management Conference be deferred for another 90 days, to a date on or after May 27, 2024.

DATED February 20, 2024.

Respectfully submitted,

LAW OFFICE OF JULIANNA RIVERA

/s/ Julianna Rivera
Julianna Rivera Maul

NORTHWEST IMMIGRANT RIGHTS
PROJECT

/s/ Matt Adams
Matt Adams
/s/ Leila Kang
Leila Kang

Aaron Korthuis
Glenda M. Aldana Madrid

Counsel for Plaintiffs

ISMAIL J. RAMSEY
United States Attorney

/s/ Kenneth W. Brakebill
Kenneth W. Brakebill
Kelsey J. Helland
Assistant United States Attorneys

Counsel for Defendant

ORDER

Pursuant to Stipulation, and good cause appearing, IT IS SO ORDERED that the Case Management Conference currently scheduled for February 27, 2024, is continued to 6/11/2024 at 1:30pm. A Case Management Statement shall be filed 7 days prior to the Case Management Conference.

Dated: February 21, 2024


HONORABLE KANDIS A. WESTMORE
United States Magistrate Judge

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**DECLARATION OF LEILA KANG IN
SUPPORT OF STIPULATION FOR
CONTINUANCE OF CASE MANAGEMENT
CONFERENCE AND ORDER**

I, Leila Kang, declare and state as follows:

1. I am a staff attorney at the Northwest Immigrant Rights Project and counsel of record for Plaintiffs in the above-captioned action.

2. I submit this declaration pursuant to Civil Local Rule 6-2(a) in support of the Parties' Stipulation for Continuance of Case Management Conference and [Proposed] Order.

DECLARATION OF LEILA KANG ISO STIP.
FOR CONTINUANCE OF CMC; ORDER
CASE NO. 4:22-CV-05183-KAW

3. Counsel for Plaintiffs and Defendant have conferred. The parties request a continuance of the Case Management Conference currently scheduled for February 27, 2024, for the following reasons:

- a. Since the May 16, 2023, Case Management Conference, the parties have produced hundreds of thousands of pages of discovery as contemplated by their agreed-upon 90-Day Disclosure Period (*see* Dkt. 48 at 4–5), and the parties are currently diligently reviewing those productions;
- b. Plaintiffs recently propounded and served the first set of discovery requests in this matter, but the Parties have agreed to toll any responses as they engage in settlement efforts;
- c. The Parties have met and conferred and are engaged in settlement discussions that could potentially lead to the resolution of Plaintiffs’ claims; and
- d. The Parties have no other substantive updates or issues requiring the Court’s attention at this time.

4. There have been five prior time modifications in this litigation.

5. The first two concerned stipulations setting, and subsequently modifying, a briefing schedule for Defendant’s motion to dismiss and continuing the initial case management deadlines to conform with resolution of that motion. *See* Dkts. 14, 18, 26, & 31.

6. The third concerned a clerk’s notice notifying the parties that the initial Case Management Conference would be continued by a week. *See* Dkt. 40.

7. The fourth concerned a stipulation requesting that the second Case Management Conference, which had been scheduled for September 26, 2023, be rescheduled. *See* Dkt. 55 & 57.

8. The fifth concerned a stipulation requesting that the rescheduled second Case Management Conference be further continued to a date on or after February 14, 2024. *See* Dkt. 58 & 59.

9. The continuance of the Case Management Conference to a date on or after May 27, 2024, would not result in any additional changes to the case schedule.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 20, 2024.

s/Leila Kang
Leila Kang
Northwest Immigrant Rights Project

DECLARATION OF LEILA KANG ISO STIP.
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